

**ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONSTRUCTION PERMIT**

Permit No. 0273-AC008

Issue Date: December 18, 2002

**ConocoPhillips Alaska, Inc.
Placer #1 Well Pad**

The Department of Environmental Conservation, under the authority of AS 46.03, AS 46.14, and 18 AAC 50.315, issues an Air Quality Construction Permit to:

**Permittee: ConocoPhillips Alaska, Inc.
P.O. Box 100360
Anchorage, AK 99510-0360**

Location: North Slope of Alaska, Between the Eastern Boundary of the Kuparuk River Unit, the Western Boundary of ConocoPhillips' (CPA's) Leases within National Petroleum Reserve and extending Southerly towards the Brooks Range. Specifically Placer #1 is located east of the Colville River and west of the Kuparuk River Unit in Section 33, Township 12 North, Range 7 East.

The project authorized by this permit consists of exploratory drilling and well testing activities in conjunction with sites identified in CPA's Winter Exploratory Drilling Program.

This construction permit imposes owner-requested limits, as provided for in 18 AAC 50.305(a)(4).

John F. Kuterbach, Manager
Air Permits Program

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PERMIT TERMS AND CONDITIONS

The permit is effective for the 2002-2004 winter drilling seasons. The permit expires May 31, 2004. The permittee may operate a single drilling and well-testing operation at the following location:

North Slope of Alaska, Placer #1 Pad Section 33, T12N, R7E, Umiat Meridian

A single drilling and testing operation is limited to a collection of equipment listed in Table 1, according to Condition 18.

A. Standard Permit Conditions

1. The permittee shall comply with each permit term and condition; noncompliance constitutes a violation of AS 46.14, 18 AAC 50, and the Clean Air Act and is grounds for:
 - a. An enforcement action;
 - b. Permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or
 - c. Denial of an operating permit application.
2. It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.
3. Each permit term or condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.
4. Compliance with the permit terms and conditions is considered to be compliance with those requirements that are:
 - a. Included and specifically identified in the permit; or
 - b. Determined in writing in the permit to be inapplicable.
5. The permit may be modified, reopened, revoked and reissued, or terminated for cause; a request by the permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
6. The permit does not convey any property rights of any sort, nor any exclusive privilege.
7. The permittee shall allow an officer or employee of the department, or an inspector authorized by the department, upon presentation of credentials and at reasonable times, with the consent of the owner or operator, to:
 - a. Enter upon the premises where a source subject to the construction permit is located or where records required by the permit are kept;
 - b. Have access to and copy any records required by the permit;

- c. Inspect any facilities, equipment, practices, or operations regulated by or referenced in the permit; and
 - d. Sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.
8. The permittee shall furnish to the department, within a reasonable time, any information the department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit, or to determine compliance with the permit. Upon request, the permittee shall furnish to the department copies of records required to be kept; the department, in its discretion, will require the permittee to furnish copies of those records directly to the federal administrator.
9. The permittee shall certify all reports, compliance certifications, or other documents submitted to the department and required by this permit as required by 18 AAC 50.205.
10. The permittee shall conduct source testing as requested by the department and shall:
 - a. Use the applicable test methods set out in 40 CFR Part 60, Appendix A, and 40 CFR Part 61, Appendix B, to ascertain compliance with applicable standards and permit requirements;
 - b. Submit to the department, within 60 days after receiving a request, and at least 30 days before the scheduled date of the tests, a complete plan for conducting the source tests;
 - c. Give the department written notice of the tests 10 days before each series; and
 - d. Within 60 days after completion of the set of tests, submit the results, to the extent practical, in the format set out in Source Test Report Outline in Volume III, Section IV.3, of the State Air Quality Control Plan, adopted by reference in 18 AAC 50.030(8).
11. **Assessable Emissions.** The permittee shall pay to the department annual emission fees based on the facility's assessable emissions as determined by the department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410. The department will assess fees per ton of each air contaminant that the facility emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of:
 - a. the facility's assessable potential to emit of 704 tpy; or
 - b. the facility's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the department, when demonstrated by
 - (1) an enforceable test method described in 18 AAC 50.220;
 - (2) material balance calculations;
 - (3) emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
 - (4) other methods and calculations approved by the department.

12. Assessable Emissions Estimates. Emission fees will be assessed as follows:

- a. No later than March 31 of each year, the permittee may submit an estimate of the facility's assessable emissions to Alaska Department of Environmental Conservation, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Suite 303, Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the department can verify the estimates; or
- b. If no estimate is received on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set out in Condition 11.a.

B. Ambient Air Quality Protection Requirements (18 AAC 50.010)

The permittee shall not interfere with the attainment or maintenance of the Ambient Air Quality Standards listed in 18 AAC 50.010 as follows:

13. Construct and operate the facility in accordance with this permit.

- a. For changes pursuant to 18 AAC 50.370(a), the permittee may notify the department pursuant to 18 AAC 50.370(b) and may implement the changes in accordance with 18 AAC 50.370(c).
- b. For other changes: Notify the department in advance of any planned modification or replacement of the fuel-burning equipment, which might result in increased potential air contaminant emissions. The notification must be in writing and must include a description of the proposed change and an estimate of any change in the quantity of emissions of each regulated air contaminant that may occur as the result of the modification or replacement.
 - (1) Ask the department if additional ambient impact assessment modeling is warranted for the proposed change.
 - (2) Within 60 days upon receiving written department notice that modeling is warranted, prepare and submit to the department an ambient impact assessment for the specified air contaminant and averaging period.
 - (3) The permittee shall not make the change until the department concurs the change will not interfere with attainment or maintenance of ambient standards and increments.

14. The permittee shall not concurrently conduct drilling or well testing operations on an exploration pad within 833 meters of a single active exploration site or within one kilometer of multiple active exploration sites.

15. Establish an ambient air boundary around the exploration site pad as follows:

- a. 250 meters from pad center for an exploration site in flat terrain, and not within 6.4 kilometers of other exploration sites.
- b. 400 meters from pad center for an exploration site in flat terrain and within 3.2 kilometers of a single concurrent operation.
- c. 380 meters from pad center for an exploration site in flat terrain and greater than 3.2 kilometers, but less than 6.4 kilometers of a single concurrent operation.

- d. 500 meters from pad center for an exploration site in flat terrain and within 6.4 kilometers of multiple concurrent operations.
16. Prohibit public access within any ambient air boundary established under Condition 15 during drilling or well testing activities. To prevent public access:
 - a. Post the area with lighted signs printed in English and Inupiat which say "*Restricted Access; Air Quality Exclusion Zone; Authorized Personnel Only; Please Check in with Drilling Manager.*" Place signs on the ice road leading to the well pad, and at least two signs on each side of the pad at the ambient air boundary. For pads where a boundary of at least 350 meters from the pad center is required, at least three signs must be placed along each side.
 - b. Maintain surveillance over the area sufficient to ensure that the public is excluded. In addition to the provisions of Condition 16, follow the surveillance plan in Exhibit B.
17. Install and operate only the sources or source groups listed in Table 1 at an exploration site pad up to the total cumulative rated capacity, listed in Table 1.
18. Limit the concurrent operation of camp generator engines at an exploration site pad to no greater than one hour during each day.
19. Limit drill rig engine operations during well testing activities as follows: Operate only one engine with a capacity of no greater than 1,080 hp.
20. To protect ambient air quality and to avoid classification as a Prevention of Significant Deterioration Major Facility, limit operations at each pad during each drilling season as set out in Table 1.

Table 1—Combustion Source Inventory

Equipment Type	Total Number	Cumulative Capacity	Maximum Size	Season Operating Limit
Drill Rig Engines	Up to 8	7,882 hp	1,450 hp	982,000 gallons
Boilers and Heaters	Up to 9	33.1 MMBtu/hr	Less than 10 MMBtu/hr	709,200 gallons
Camp Engines	Up to 2	1,200 hp	600 hp	93,700 gallons
Camp Incinerators	Up to 2	175 lb/hour	95 lb/hr	2,880 hours
“				59,900 gallons
Miscellaneous Engines	No Limit	350 kW	350 kW	70,350 gallons
Miscellaneous Heaters	No Limit	20 MMBtu/hr	Less than 10 MMBtu/hr	428,300 gallons
Well Test Flare	1	46 MMscf/day	46 MMscf/day	1,150 MMscf

21. Provide to the department a copy of the Transportable Drilling Rig Relocation/Operation Notification as set out in Exhibit F prior to locating the rig at the pad listed in this permit. The certification of the Transportable Drilling Rig Relocation/Operation Notification must be provided to the department within 10 days after locating the rig at the pad listed in this permit.

22. Use only arctic heating fuel in liquid fuel fired combustion sources. Do not burn fuel with a sulfur content greater than 0.25 weight % sulfur in any equipment authorized under this permit.
23. Do not conduct drilling and well testing operations concurrently on the same pad.

C. 18 AAC 50.040: Federal Standards Adopted by Reference

24. Comply with the requirements of 40 CFR 60, New Source Performance Standards (NSPS) as they apply to affected facilities specified below.
25. Submit a copy of all NSPS reporting to the U.S. Environmental Protection Agency (EPA) and the department, as required by the applicable Federal standards. The permittee may attach periodic federal reporting to the Facility Operating Report required by Condition 44.
26. Notify the department of any EPA granted waivers of NSPS emission standards, record keeping, monitoring, performance testing, or reporting requirements within 30 days after the permittee receives a waiver.
27. Do not install any steam generating unit with a maximum heat input capacity equal to or greater than 10 million Btu/hour.
28. Do not burn sewage sludge in permitted incinerator equipment.
29. 40 CFR 60, Subpart Kb; Diesel Storage Tanks--Temporary Fuel Storage Tanks
 - a) Applicability and designation of affected facility, 40 CFR 60.110b.
 - (1) Volatile organic liquid storage tanks greater than 40 cubic meters in volume (10,567 gallons) for which construction, reconstruction, or modification commenced after July 23, 1984 are subject to this Subpart as listed in 40 CFR 60.110b(a).
 - b) Monitoring of operations, 40 CFR 60.116b.
 - (1) Pursuant to 40 CFR 60.116b(a) and (b), keep readily accessible records showing the dimension of the storage vessels and an analysis showing the capacity of the storage vessel for each storage tank greater than equal to 40 cubic meters (10,567 gallons) for the life of the tank.

**D. Opacity, Particulate Matter and Sulfur Compound Emission Requirements
(18 AAC 50.055(a)(1), (b)(1) and (c), 18 AAC 50.040(e))**

The emission standards of Section D do not apply to non-road engines. [Clean Air Act, Section 209 (e)(1)]

30. Do not allow emissions from any fuel-burning equipment to reduce visibility through the exhaust by more than 20% for a total of more than 3 minutes in any one hour. Do not allow emissions from any fuel-burning equipment to reduce visibility through the exhaust by more than 20%, six-minute average.
31. Do not allow particulate matter emissions from any fuel-burning equipment to exceed 0.05 grains per dry standard cubic foot.

32. Comply with 18 AAC 50.055(c), which states that sulfur compound emissions, expressed as sulfur dioxide, may not exceed 500 ppm averaged over a period of three hours. Ensure compliance with this requirement by using only natural gas fuel with a hydrogen sulfide content not to exceed 150 ppm, and by using distillate fuel oil with a sulfur content not to exceed 0.25%.

E. Incinerator Emission Standards (18 AAC 50.050)

33. The permittee shall comply with 18 AAC 50.050(a)(2), which requires visibility through the exhaust effluent of an incinerator may not be reduced by visible emissions, excluding condensed water vapor, by more than 20 percent, for a total of more than three minutes in any one hour for any incinerator other than a municipal wastewater treatment plant sludge incinerator.

F. Air Pollution Prohibited

34. No person may permit any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property. (18 AAC 50.110)
35. Monitoring, Record Keeping, and Reporting for Air Pollution Prohibited
- a. If emissions present a potential threat to human health or safety, the permittee shall report any such emissions according to 45.
 - b. As soon as practicable after becoming aware of a complaint that is attributable to emissions from the facility, the permittee shall investigate the complaint to identify emissions that the permittee believes have caused or are causing a violation of Condition 34.
 - c. The permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
 - (1) after an investigation because of a complaint or other reason, the permittee believes that emissions from the facility have caused or are causing a violation of Condition 34; or
 - (2) the department notifies the permittee that it has found a violation of Condition 34.
 - d. The permittee shall keep records of
 - (1) the date, time, and nature of all emissions complaints received;
 - (2) the name of the person or persons that complained, if known;
 - (3) a summary of any investigation, including reasons the permittee does or does not believe the emissions have caused a violation of Condition 34; and
 - (4) any corrective actions taken or planned for complaints attributable to emissions from the facility.
 - e. With each facility operating report under Condition 44, the permittee shall include a brief summary report which must include:
 - (1) the number of complaints received;
 - (2) the number of times the permittee or the department found corrective action necessary;

- (3) the number of times action was taken on a complaint within 24 hours; and
 - (4) the status of corrective actions the permittee or department found necessary that were not taken within 24 hours.
- f. The permittee shall notify the department of a complaint that is attributable to emissions from the facility within 24 hours after receiving the complaint, unless the permittee has initiated corrective action within 24 hours of receiving the complaint.

G. Compliance Monitoring Plan (includes monitoring and record keeping)

36. Provide unique identification and labels on each emission source at the facility. Maintain additional information on emission sources and their groups as applicable to identify source groups as classified in Table 1, in an on-site log available to department compliance officers.
37. Source Groups with Fuel Consumption Limits.
- Each day, record the total fuel consumed for each source group listed in Table 1, Condition 20. Calculate the total fuel consumption for each source group listed in Table 1 for the season. Compare the total liquid-fuel and total flared-gas to the allowable quantities specified in Table 1, Condition 20. Report the fuel consumption of each listed source group in the facility operating report, as specified in Exhibit A.
38. Source Groups with Limits on Hours of Operation.
- Estimate and keep daily records of operating hours for each incinerator. Calculate the total incinerator operating hours for the season. In lieu of monitoring and recording the operating hours, the permittee may estimate incinerator operations based on 24-hours for each day of incinerator operation.
- Include in the facility operating report specified in Appendix A, the total seasonal operations for each incinerator.
39. Keep records of the fuel sulfur.
- a. For arctic heating fuel obtained from either of the two North Slope topping plants, record the fuel sulfur, measured in accordance with an appropriate methodology incorporated by reference within fuel specification standard ASTM D 396-92 or D 975-94 at least once in each month of operation.
 - b. For arctic heating fuel obtained from any other source, record the fuel sulfur, measured in accordance with an appropriate methodology incorporated by reference within fuel specification standard ASTM D 396-92 or D 975-94 for each fuel shipment. Alternatively, provide a copy of the fuel vendor's fuel oil sulfur analysis results based on appropriate ASTM methodology.
 - c. Measure and record flare gas sulfur concentration as H₂S and quantity of flared gas each day and total flared gas for each reservoir tested. Report the total quantity of flared gas in the facility operating report, as specified in Exhibit A. Report the maximum flared gas sulfur concentration as H₂S as specified in Exhibit A.
40. Monitor visible emissions from the flare using Method 9 from 40 CFR 60, Appendix A, at least once in each calendar week in which the flare is operated. Compare to the standard in Condition 30. Take the readings while the flare is at its maximum operating rate for the period. Permittee shall attach the surveillance results to the Facility Operating Report set out in Condition 44.

41. Keep records of any public complaint, including the date, time, nature of complaint, and measures taken to resolve the complaint within ten days upon receiving a public complaint.
42. Keep records of required monitoring data and support information for at least five years after the date of the collection; support information includes calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by this permit. Keep monitoring and compliance records as required by the Clean Air Act and applicable federal air quality regulations.

H. Reporting Requirements

43. Except for excess emission reports under Condition 45, submit test plans, reports, certifications, and notices required under this permit to the department's Air Permits Program, Compliance Assurance Group, 610 University Avenue, Fairbanks, Alaska 99709; telephone (907) 451-2139, facsimile (907) 451-2188.
44. Send the department two copies of the facility operating report as described in Exhibit A.
45. Excess Emissions and Permit Deviation Reports--Except as provided in Condition 35, the permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:
 - a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commences or is discovered, report
 - (1) emissions that present a potential threat to human health or safety; and
 - (2) excess emissions that the permittee believes to be unavoidable;
 - b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology based emission standard;
 - c. report all other excess emissions and permit deviations
 - (1) within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in conditions 45c(2) and 45c(3);
 - (2) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the department provides written permission to report under Condition 45c(1); and
 - (3) for failure to monitor, as required in other applicable conditions of this permit.
 - d. When reporting excess emissions, the permittee must report using either the department's online form, which can be found at www.dec.state.ak.us/awq/excess/report.asp, or, if the permittee prefers, the form contained in Exhibit E of this permit. The permittee must provide all information called for by the form that is used.
 - e. When reporting a permit deviation, the permittee must report using the form contained in Exhibit E of this permit. The permittee must provide all information called for by the form.
 - f. If requested by the department, the permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

EXHIBIT A

FACILITY OPERATING REPORT

Submit to the department two copies of the Facility Operating Report no later than 30 days after the completion of the winter drilling and testing program for 2002-2003. This report shall include the following information. All quantities must be reported, even if zero.

1. Facility Identification: Name of company, facility name, location, and permit number.

ConocoPhillips Alaska, Inc.

Winter Drilling Program report for Winter <year>

Placer #1

P.O. Box 100360

Anchorage, AK 99510-0360

Permit Number: 0273-AC008

2. The report date and the time period covered by the report.
3. Beginning and ending dates for operations at the pad.
4. The equipment, maximum unit capacity and total group capacity, installed under each source group listed in Table 1.
5. Attach copies of any reports required by an NSPS as set out in Condition 25.
6. Attach copies of any EPA waivers of NSPS requirements as set out in Condition 26.
7. Attach a written description of any public complaint received as set out in Condition 35.e.
8. As set out in Condition 37, the total fuel consumed by each source group subject to a fuel limit listed in Table 1, Condition 20.
9. The maximum capacity of each source operated.
10. Total hours of operation for each incinerator as described in Condition 38.
11. The fuel sulfur content for each month of operation or each fuel delivery, as recorded under Condition 39.
12. The maximum flare gas hydrogen sulfide concentration and the total quantity of flared gas as described in Condition 39.c.
13. Copies of Method 9 readings for all visible emission observations made for the well test flare as required by Condition 40.
14. Certification in accordance with 18 AAC 50.205. The responsible official's signature does not need to be notarized.

EXHIBIT B

Public Access Control Plan

The permittee has provided the following control plan for prohibiting public access within the ambient air boundary established under Condition 15. The department approves the plan as provided. The area where public access is prohibited under Condition 16 is not considered to be ambient air.

**Surveillance Plan
for
Ambient Air Quality Boundaries
ConocoPhillips Alaska Inc. (CPA)
Winter Exploration Drilling Operations**

Background:

The Alaska Department of Environmental Conservation (ADEC) Air Quality Construction Permits for North Slope onshore winter exploration drilling operations have call for a public access control plan for winter exploration drilling operations. The sign posting requirements are as follows:

To prevent public access:

- a. Post the area with signs that are either lighted or constructed of reflective material printed in English and Inupiat which indicate *Restricted Access; Air Quality Exclusion Zone; Authorized Personnel Only; Please Check-in with Drilling Manager*. Place one sign on the ice road leading to the well pad, and at least two on each side of the pad at the ambient air boundary. For pads where a boundary of at least 250 meters from the pad edge is required, at least three signs must be placed along each side.
- b. Maintain surveillance over the area sufficient to ensure that the public is excluded.

Surveillance Plan Personnel:

CPA's surveillance plan personnel for the various onshore winter exploration drilling projects will vary by location.

CPA will have full time polar bear monitors due to the proximity of certain sites to the coast. Hence, for these wells, CPA will utilize polar bear monitors to watch for entry of unauthorized personnel in addition to their polar bear duties.

For all other operations, CPA will utilize the forklift driver, the roustabout crews, and technicians from *Alaska Clean Seas* to perform surveillance duties.

Additionally, for all operations, all on-site personnel will be informed of the air permitting requirements to maintain an exclusion zone at the location. All personnel will be asked to maintain an exclusion zone at the location. All personnel will be asked to observe the location perimeter as they conduct their regular duties. Any suspected violation of the exclusion zone by unauthorized personnel shall be immediately reported to the surveillance monitoring individual by the observing party.

Surveillance Actions:

The designated surveillance personnel will be required to patrol the area between the pad edge and the edge of the exclusion zone at a frequency of at least every four hours or six times daily, weather permitting. The surveillance personnel will log the time and date of the location patrol. These logs will be recorded on the attached form. These completed forms will be maintained on location in the CPA rig supervisor's office or in another on-site location designated by the CPA rig supervisor.

If the surveillance individual encounters unauthorized personnel in the air exclusion zone, the following steps will be taken by that individual:

- Approach the unauthorized person (or persons) and request that they leave the exclusion zone immediately.
- If the unauthorized individual(s) refuse to leave the exclusion zone area after the above request, they will be informed that:
 - they are subjecting themselves to an area where national ambient air quality standards may not be met;
 - State regulations require CPA to restrict entry to the posted area to authorized personnel only; and
 - The unauthorized person or persons will again be asked to leave the exclusion zone area.
- If the unauthorized individual(s) still refuse to leave, they will be informed that neither CPA nor any State agency will be liable or responsible for any harm they may encounter by being in a restricted entry area. The surveillance individual will also request the name or names of the unauthorized personnel at that time. The surveillance individual will then log the encounter with the unauthorized person or persons on the surveillance form. The data to be logged in such a situation will include:
 - 1) The name of the individual (if known or otherwise provided)
 - 2) The method of entry into the exclusion zone (e.g., by foot, snow machine, etc.)
 - 3) Duration of unauthorized presence within the exclusion zone
 - 4) Other pertinent information as appropriate

The surveillance individual will also report such incidents to the CPA rig supervisor or their designated alternate for such purposes at the next available opportunity.

- If unauthorized personnel entry into the exclusion zone poses safety concerns due to operational activities (e.g. the person or persons are approaching the test flare during operation, etc.), the CPA rig supervisor shall immediately be contacted by the surveillance individual. Actions will then be taken as deemed appropriate by the CPA rig supervisor.
- CPA will include summary information regarding any exclusion zone violations in the facility operating report for each prospect.
- The completed surveillance forms will be maintained on location until completion of the operation. At that time, all completed forms should be sent to CPA's Exploration Environmental Coordinators (Internal Mail Address NSK 61, telephone: 659-7212) for maintenance. All completed forms will be maintained for a period of one year after the completion of operations unless otherwise requested by the ADEC.

**Air Exclusion Zone
Surveillance Monitoring Form**
(please complete one form for each calendar day of operations)

Date: _____

<u>Pad Surveillance Trip# & Time</u>	<u>Surveillance done by</u>	<u>Comments</u>
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Note: Pad surveillance must be performed at least every four (4) hours or six (6) times daily during operations

EXHIBIT C

PERMIT APPLICATION DOCUMENTATION

September 5, 2001	Phillips letter and Supplemental Modeling
August 6, 2001	ADEC Protocol approval letter
August 6, 2001	2000-2001 Winter Drilling Program Application and transmittal letter X134
July 2001	Phillips Modeling Protocol
September 25, 2001	Review of PAI's Modeling Analysis of 2001-2002 Winter Drilling Activities
July 3, 2002	Letter from Michael A. Stahl (Phillips Alaska, Inc.) to Jim Baumgartner (ADEC) requesting ADEC initiation of permitting and public review process of winter drilling operations.

EXHIBIT D

VISIBLE EMISSION FORMS

Visible Emissions Forms Page 1 of ____

When doing readings: Maintain a distance of at least 15 feet from the emission point; when possible while still conforming to Method 9, select a position to minimize interference between sources; if interference cannot be avoided between sources, use the least stringent opacity standard that applies to any of the sources involved; and if wet dust suppression is used, read the part of the plume where there are no visible emissions caused by water mist.

Certified Observer _____

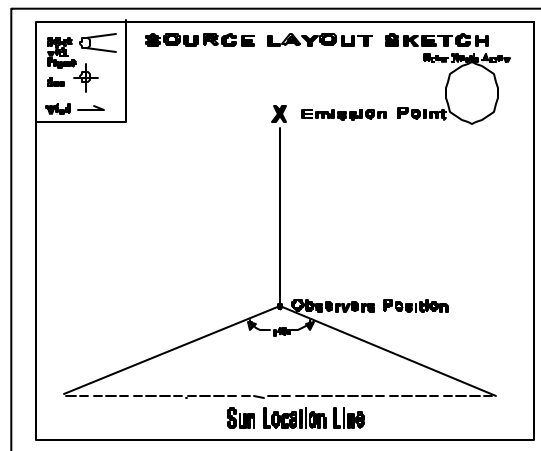
Company _____

Location _____

Test No. _____ Date _____
Source _____

Operating Rate: _____

Hrs. of observation: _____



Clock Time	Initial			Final
Observer location				
Distance to discharge				
Direction from discharge				
Height of observer point				
Background description				
Weather conditions				
Wind Direction				
Wind speed				
Ambient Temperature				
Relative humidity				
Sky conditions: (clear, overcast, % clouds, etc.)				
Plume description: Color				
Distance visible				
Water droplet plume? (attached or detached?)				
Other information				

Use the procedures specified in 40 CFR 60, Appendix A, Method 9, to perform this observation.



Page ____ of ____

Company _____ Certified Observer _____

Test Number _____ Clock time _____

A minimum reading is 24, every 15 seconds for a total length of 6 minutes

[illegible]

Additional information:

Observer Signature

Average Opacity Summary

Set Number	Time Start--End	Opacity	
		Sum	Average

EXHIBIT E

EXCESS EMISSION NOTIFICATION FORM

Excess Emission Notification Form FAX to (907) 269-7508, phone: 269-8888

Company Name: _____ **Facility Name:** _____

NOTE: Attach Additional Sheets If Necessary

Event Information:			Duration
Date: _____	Start Time (Military Time) _____	End Time _____	(hr:min) ____:____
Date: _____	Start Time (Military Time) _____	End Time _____	(hr:min) ____:____
			Total ____:____

Cause of Event (Check all that apply):

<input type="checkbox"/> Start Up	<input type="checkbox"/> Upset Condition	<input type="checkbox"/> Control Equipment Failure
<input type="checkbox"/> Shut Down	<input type="checkbox"/> Scheduled Maintenance	<input type="checkbox"/> Other _____

Details: Describe in detail what happened. Attach additional sheets if necessary.

Sources Involved: Identify each emission source involved by name and ID number as it appears in the permit. List any control device or monitoring system affected by the event.

Source ID:	Description:
_____	_____
_____	_____
_____	_____

Emission Standard Exceeded: Identify each emission standard and permit condition exceeded during the event. Also describe the extent to which each standard or conditions was exceeded. List any known or suspected injuries or health impacts.

Standard or Condition	Limit	Exceedance
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Emission Reduction: Describe the steps taken to reduce emissions during the event.

Corrective Actions: Describe actions taken to restore the system to normal operation.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____

Signature: _____

Phone Number: _____

Date: ____/____/____

Excess Emission Notification Form – Fax: (907) 269-7508; Phone: (907) 269-8888

EXHIBIT F
TRANSPORTABLE DRILLING RIG RELOCATION/OPERATION NOTIFICATION

Permittee shall submit the information specified below to the Air Permits Program prior to moving the drilling rig to the pad listed in this permit.

1. Facility Name: _____
2. Operator's Name: _____
3. Operator's Address: _____
4. Facility Contact: _____
5. Contact Telephone Number: _____
6. Permit Number: _____
7. Drilling Location: _____
8. Rig Name: _____
9. Attach an inventory of all fuel-burning equipment and of all non-road engines larger than 150 hp associated with the drilling and camp activities at the pad.

Certification

"Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete."

Signed this _____ day of _____, 2001, upon my oath of affirmation, before a notary of the State of Alaska.

(Responsible Company Official Date

Printed Name Title

Subscribed and sworn to before me on this _____ day of _____, 2000.

My authorization as a Notary of the State of Alaska expires on the _____ day of _____, 2001.

Notary's Signature Date

Notary's Printed Name Notary Seal